

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE
CENTRE GMBH and WEST PUBLISHING
CORPORATION,

Plaintiffs/Counterdefendants,

V.

ROSS INTELLIGENCE INC.,

Defendant/Counterclaimant.

C.A. No. 20-613-SB

JURY TRIAL DEMANDED

PUBLIC VERSION

**DECLARATION OF ANNA Z. SABER IN SUPPORT
DEFENDANT/COUNTERCLAIMANT ROSS INTELLIGENCE INC.'S
LETTER BRIEF RE SCHEDULING**

OF COUNSEL:

Gabriel M. Ramsey
Warrington S. Parker III
Joachim B. Steinberg
Jacob Canter
Christopher J. Banks
Margaux Poueymirou
Anna Z. Saber
CROWELL & MORING LLP
3 Embarcadero Center, 26th Floor
San Francisco, CA 94111
Tel: (415) 986-2800

Mark A. Klapow
Crinesha B. Berry
CROWELL & MORING LLP
1001 Pennsylvania Avenue, NW
Washington, DC 20004
Tel: (202) 624-2500

Shira Liu
CROWELL & MORING LLP
3 Park Plaza, 20th Floor
Irvine, CA 92614
Tel: (949) 263-8400

David E. Moore (#3983)
Bindu A. Palapura (#5370)
Andrew L. Brown (#6766)
POTTER ANDERSON & CORROON LLP
Hercules Plaza, 6th Floor
1313 N. Market Street
Wilmington, DE 19801
Tel: (302) 984-6000
dmoore@potteranderson.com
bpalapura@potteranderson.com
abrown@potteranderson.com

*Attorneys for Defendant/Counterclaimant
ROSS Intelligence, Inc.*

Dated: May 17, 2023

10813854 / 20516.00001

Public Version Dated: May 24, 2023

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	
)	C.A. No. 20-613-SB
Plaintiffs/Counterdefendants,)	
)	JURY TRIAL DEMANDED
v.)	
)	
ROSS INTELLIGENCE INC.,)	PUBLIC VERSION
)	
Defendant/Counterclaimant.)	

**DECLARATION OF ANNA Z. SABER IN SUPPORT
DEFENDANT/COUNTERCLAIMANT ROSS INTELLIGENCE INC.'S
LETTER BRIEF RE SCHEDULING**

I, Anna Z. Saber, declare as follows:

1. I am an attorney at Crowell & Moring, LLP, and counsel of record for ROSS Intelligence, Inc. I am an attorney, admitted to the California Bar and have been admitted *pro hac vice* with this Court. I submit this Declaration in support of Defendant/Counterclaimant ROSS Intelligence Inc.'s ("ROSS") Reply Briefs In Support of Its Letter Brief Regarding Modifying the Scheduling Order.

2. On February 8, 2023 Plaintiff/Counterdefendants Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation's ("Plaintiffs") produced their first production of documents responsive to the counterclaim document requests ("Plaintiffs' CC Production". Volume 1 of Plaintiffs' CC Production included 1,152 documents. Plaintiffs produced Volume 2-5 of Plaintiffs' CC Production on February 14, 2023, February 21, 2023, February 22, 2023, and February 23, 2023, respectively. Volume 2 contained 60,813 documents, Volume 3 contained 356,565 documents, Volume 4 contained 38,050, and Volume 5 contained 77,276 documents.

3. Plaintiffs did not produce any more documents until April 17, 2023, less than one month before the close of fact discovery.

4. On April 17, 2023, Plaintiffs produced Volume 6 of Plaintiffs' CC Production, which contained 72 documents. Also on April 17, 2023, Plaintiffs produced Volume 7 of Plaintiffs' CC Production, which contained 35,043 documents.

5. On April 20, 2023, Plaintiffs produced Volume 8 of Plaintiffs' CC Production, which contained 35,366 documents. On April 23, 2023, Plaintiffs Produced Volume 9 of Plaintiffs' CC Production, which contained 57,417 documents. On April 25, 2023, Plaintiffs produced Volume 10 of Plaintiffs' CC Production, which contained 52 documents. From April 24 -28, 2023 ROSS deposed eight of Plaintiffs' witnesses.

6. Following the deposition of all but two of Plaintiffs' witnesses, on May 2, 2023 Plaintiffs produced Volume 11 of Plaintiffs' CC Production, which contained 249,995 documents.

7. On May 3, 2023, Plaintiffs produced Volume 12 of Plaintiffs' CC Production, which contained 300,727 documents. ROSS deposed

8. On May 8, 2023, Plaintiffs produced Volumes 13 and 14 of Plaintiffs' CC Production. Volume 13 was a replacement production for documents previously clawed back. Volume 14 contained 70,625 documents

9. On May 10, 2023, Plaintiffs produced Volume 15 of Plaintiffs' CC Production, which contained 141,898 documents. On the same day, Plaintiffs also produced Volume 16 and 17 of Plaintiffs' CC Production; Volume 16 was a replacement production for documents previously clawed back and Volume 17 contained 1 document.

10. On May 11, 2023, Plaintiffs produced Volumes 18-20 of Plaintiffs' CC Production. Volume 18 contained 7 documents. Volume 19 was a replacement production for documents

previously clawed back. Volume 20 contained 24 documents. From May 2, 2023 through May 11, 2023, Plaintiffs' CC Production totaled 3,405,627 pages.

11. A true and correct copy of a March 29, 2023 email from Jacob Canter to Plaintiffs' Counsel regarding additional custodians is attached to this declaration as **Exhibit 1**.

12. A true and correct copy of Plaintiffs' Counterclaim Initial Disclosures which was served on September 1, 2022 (D.I. 222) is attached to this declaration as **Exhibit 2**.

13. Ben Davis, who based on his LinkedIn profile is Plaintiffs' Manager of Revenue Management and Strategy was not disclosed by Plaintiffs. Since April 17, 2023, Plaintiffs have produced 1489,284 documents where Mr. Davis is a custodian. Maria Redmond, who based on her LinkedIn profile is Plaintiffs' Sales and Client Management Director was also not disclosed by Plaintiffs. Similarly, since April 17, 2023, Plaintiffs have produced 82,787 documents where Ms. Redmond is the custodian. Jenny Deutsch, Plaintiffs' Commercial Policy Enablement Manager was also not disclosed by Plaintiffs; Since April 17, 2023, Plaintiffs have 76,818 documents where Ms. Deutsch is the custodian. Finally, Plaintiffs failed to disclose Eric Gleason, who is Plaintiffs' Vice President of Sales, FindLaw. Since April 17, 2023, Plaintiffs have produced 70,742 documents with Mr. Gleason as the custodian.

14. A true and correct copy of an email from Shira Liu to Plaintiffs' Counsel regarding custodians dated February 28, 2023 is attached to this declaration as **Exhibit 3**.

15. A true and correct copy of TRCC-02152101, a document produced by Plaintiffs in response to ROSS's counterclaim documents requests is attached to this declaration as **Exhibit 4**. An associate at Crowell looked through Plaintiffs' counterclaim production for documents related to the agreements referenced in TRCC-02152101, however based on their search of Plaintiffs' counterclaim production, such documents were not located.

16. A true and correct copy of TRCC-02224874, a document produced by Plaintiffs in response to ROSS's counterclaim requests is attached to this declaration as **Exhibit 5**.

17. A true and correct copy of TRCC-02225066, a document produced by Plaintiffs in response to ROSS's counterclaim requests is attached to this declaration as **Exhibit 6**.

18. Both Exhibit 5 and Exhibit 6 are email chains referencing various arrangements or agreements with specific courts. However, when an associate at Crowell searched for the agreements in Plaintiffs' counterclaim production, such agreements were not located.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed at San Francisco, California on May 17, 2023.

/s/ Anna Z. Saber

Anna Z. Saber

10813854/20516.00001